

**REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed September 13, 2007 ("*Office Action*"). Claims 1-8, 11-18, and 21-24 are pending in the Application and stand rejected. Applicant respectfully requests reconsideration and favorable action in this case.

**I. Section 102 Rejections**

The *Office Action* rejects Claims 1-8, 11-18, and 21-24 under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 6,008,785 issued to Hewlett et al. ("*Hewlett*"), which is a patent granted to the inventor of the present Application. Applicant respectfully traverses these rejections and submits that *Hewlett* does not describe, expressly or inherently, each and every limitation of the claims for at least several reasons.

Independent Claim 1 recites:

A method of creating an image, the method comprising:  
operating a display to create a sequence of bit display periods, said bit display periods comprising:  
at least one conflict bit period skewed with respect to other said bit display periods; and  
at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit.

The *Office Action* relies on *Hewlett* to allegedly teach these limitations, but that is incorrect. Applicant respectfully submits that *Hewlett* does not disclose, teach, or suggest, for example, "at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit." The *Office Action* states that *Hewlett* teaches this limitation in Figures 9A and 9B, alleging that "as can be seen from the drawings, when the resets are skewed to correct for overlap, the weights are changed from a target weight," but this is incorrect. (*Office Action*, pp. 2-3). Rather, Figures 9A, 9B, and the corresponding text in the *Hewlett* specification merely teach a technique for avoiding reset conflicts by offsetting skewed segments of an image bit-plane. (See *Hewlett*, col. 2, ll. 41-43; col. 9, l. 63 - col. 10, l. 10; Figs. 9A, 9B). Offsetting skewed segments does not disclose, teach, or suggest "at least two compensating bit periods having a

bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit,” as required by Claim 1.

Specifically, as the *Office Action* dated 28 March 2007 noted with regard to *Hewlett*, when “the segments are in the same bit-plane, the segments individually are skewed and create an error of longer display times, but together offset each other.” (*Office Action dated 28 March 2007*, p. 10) (emphasis added). That *Office Action* further noted that, “[i]n the case that the segments are in different bit-planes, a counterskew is placed somewhere else in the frame to compensate, but the compensating bits still have uncorrected errors, since compensation merely adjusts for errors that are present.” (*Office Action dated 28 March 2007*, p. 10) (emphasis added). Skewing multiple segments of image bit-planes such that any changes to the display time caused by one skew are offset by another skew does not disclose, teach, or suggest “at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit,” as required by Claim 1. For at least these reasons, independent Claim 1 is allowable, as are the claims depending therefrom. Favorable action is requested.

Applicant appreciates the Examiner’s consideration of and response to Applicant’s previously submitted arguments. However, as noted above, Applicant respectfully submits that *Hewlett* fails to disclose, teach, or suggest each and every element of Claim 1. In response to Applicant’s previously submitted arguments, the *Office Action* incorrectly alleges that *Hewlett* teaches the limitations of Claim 1, stating:

Figures 9A and 9B [of *Hewlett*] are similar to Figures 6 and 7 of the present application, which shows that an uncorrected error created by skewing causes an actual weight of at least one image bit to differ from a target weight of that image bit. Therefore by skewing segment n+1, the weights of segments n and n+2 differ from their target weights. As a result, *Hewlett* still reads on claims 1-8, 11-18, and 21-24.

(*Office Action*, p. 9). Applicants respectfully note that the Examiner’s comments in the response to Applicant’s previous arguments (*Office Action*, p.9) are very similar to the Examiner’s comments regarding Claim 1 (*Office Action*, pp. 2-3), discussed above. Thus, for analogous reasons to those explained with reference to Claim 1 above, the portion of *Hewlett* cited in the Examiner’s response also fails to disclose, teach, or suggest every limitation of

independent Claim 1. In particular, offsetting changes to individual segments  $n$  and  $n+2$  caused by skewing a segment  $n+1$  (see *Hewlett*, Figs. 9A, 9B) does not disclose, teach, or suggest “the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit.” For at least these reasons, independent Claim 1 is allowable, as are the claims depending therefrom. Favorable action is requested.

Independent Claims 11 and 21 include limitations that, for analogous reasons, are not taught by *Hewlett*. Because *Hewlett* does not disclose, expressly or inherently, every element of independent Claims 1, 11, and 21, Applicant respectfully requests reconsideration and allowance of Claims 1, 11, and 21, together with their respective dependent claims.

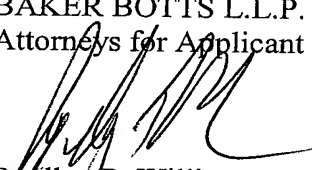
**CONCLUSION**

Applicant has made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

Applicant believes no fees are due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 20-0668 of Texas Instruments Incorporated.

Respectfully submitted,

BAKER BOTTS L.L.P.  
Attorneys for Applicant



Bradley P. Williams  
Reg. No. 40,227  
(214) 953-6447

Date: \_\_\_\_\_

12/12/07

CORRESPONDENCE ADDRESS:

Customer Number: **23494**